

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

QUALCOMM INC., a Delaware corporation,  
QUALCOMM TECHNOLOGIES, INC., a  
Delaware corporation,

Plaintiffs,

v.

ARM HOLDINGS PLC, f/k/a ARM LTD., a  
U.K. corporation,

Defendant.

C.A. No. 24-490-MN

**PUBLIC VERSION  
(Filed August 11, 2025)**

**ARM’S MOTION TO COMPEL QUALCOMM TO SUPPLEMENT DISCOVERY  
RESPONSES AND PRODUCE WITNESSES FOR DEPOSITION**

Pursuant to the Court’s Order Appointing Special Master (D.I. 336), Arm Holdings PLC (“Arm”) hereby moves the Court for an order compelling Plaintiffs Qualcomm Inc. and Qualcomm Technologies, Inc. (collectively “Qualcomm”) to supplement its discovery responses and produce witnesses for deposition. More specifically, Arm requests an Order, substantially similar to the proposed order attached hereto, requiring Qualcomm to (1) provide a deposition date for Pradeep Kanapathipillai; (2) provide 30(b)(6) witnesses for the various topics it has improperly withheld testimony; (3) provide discovery on the requests it is improperly claiming lack of relevance; (4) provide discovery necessary for Arm to assess Qualcomm’s claim that Arm breached its ALA by not providing OOBs and ACK patches; (5) regarding its tortious interference claims, provide information (and testimony) on its own communications with the media, and unseal the identities of the companies; (6) explain the theory on which it plans to litigate its UCL claim; and (7) comply with the provisions of the Court’s ESI Order (D.I. 85) as it pertains to search terms and custodians.

The grounds for this motion are fully set forth in Arm's Opening Letter Brief and the Declaration of Matthew J. McIntee, which were submitted to the Special Master contemporaneously herewith. Pursuant to D. Del. LR 7.1.1., undersigned counsel certifies that a reasonable effort was made to reach agreement with ADI regarding the matters set forth in this motion, including oral communication involving Delaware counsel for all parties, and no agreement was reached.

Dated: August 1, 2025

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

OF COUNSEL:

Gregg F. LoCascio, P.C.  
Jason M. Wilcox, P.C.  
Meredith Pohl  
Matthew J. McIntee  
KIRKLAND & ELLIS LLP  
1301 Pennsylvania Ave., NW  
Washington, DC 20004  
(202) 389-5000  
glocascio@kirkland.com  
jason.wilcox@kirkland.com  
meredith.pohl@kirkland.com  
matt.mcintee@kirkland.com

Jay Emerick  
Adam M. Janes  
KIRKLAND & ELLIS LLP  
333 West Wolf Point Plaza  
Chicago, IL 60654  
(312) 862-2000  
jay.emerick@kirkland.com  
adam.janes@kirkland.com

Peter Evangelatos  
KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, NY 10022  
(212) 446-4800  
peter.evangelatos@kirkland.com

Daralyn J. Durie  
Shaelyn Dawson  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, CA 94105  
(415) 268-7000  
ddurie@mofo.com  
shaelyndawson@mofo.com

Erik J. Olson  
MORRISON & FOERSTER LLP  
755 Page Mill Road  
Palo Alto, CA 94304  
(650) 813-5600  
ejolson@mofo.com

/s/ Anne Shea Gaza

Anne Shea Gaza (No. 4093)  
Robert M. Vrana (No. 5666)  
Samantha G. Wilson (No. 5816)  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
(302) 571-6600  
agaza@ycst.com  
rvrana@ycst.com  
swilson@ycst.com

*Attorneys for Defendant Arm Holdings PLC*

Kyle W.K. Mooney  
MORRISON & FOERSTER LLP  
250 West 55th Street  
New York, NY 10019  
(212) 336-4092  
kmooney@mofo.com

Scott F. Llewellyn  
MORRISON & FOERSTER LLP  
4200 Republic Plaza  
370 Seventeenth Street  
Denver, CO 80202  
(303) 592-2204  
sllewellyn@mofo.com

Nicholas Rylan Fung  
MORRISON & FOERSTER LLP  
707 Wilshire Boulevard  
Los Angeles, CA 90017  
(213) 892-5348  
nfung@mofo.com

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 1, 2025, a copy of the foregoing document was served on the counsel listed below in the manner indicated:

**BY EMAIL**

Jack B. Blumenfeld  
Jennifer Ying  
MORRIS, NICHOLS, ARSHT  
& TUNNELL LLP  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
jblumenfeld@morrisnichols.com  
jying@morrisnichols.com

Isaac B. Zaur  
Nora Niedzielski-Eichner  
CLARICK GUERON REISBAUM LLP  
220 Fifth Avenue, 14th Floor  
New York, NY 10001  
izaur@cgr-law.com  
nniedzie@cgr-law.com

Catherine Nyarady  
Anna R. Gressel  
Jacob A. Braly  
Alexander M. Butwin  
PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP  
1285 Avenue of the Americas  
New York, NY 10019  
cnyarady@paulweiss.com  
agressel@paulweiss.com  
jbraly@paulweiss.com  
abutwin@paulweiss.com

Karen L. Dunn  
William A. Isaacson  
Melissa F. Zappala  
Erin J. Morgan  
Anna P. Lipin  
William T. Marks  
PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP  
2001 K Street, NW  
Washington, DC 20006  
kdunn@paulweiss.com  
wisaacson@paulweiss.com  
mzappala@paulweiss.com  
ejmorgan@paulweiss.com  
alipin@paulweiss.com  
wmarks@paulweiss.com

Andrea L. D'Ambra  
Susana Medeiros  
Kira Latham  
NORTON ROSE FULBRIGHT US LLP  
1301 Avenue of the Americas  
New York, NY 10019  
andrea.dambra@nortonrosefulbright.com  
susana.medeiros@nortonrosefulbright.com  
kira.latham@nortonrosefulbright.com

YOUNG CONAWAY STARGATT & TAYLOR,  
LLP

/s/ Anne Shea Gaza

Anne Shea Gaza (No. 4093)  
Robert M. Vrana (No. 5666)  
Samantha G. Wilson (No. 5816)  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
(302) 571-6600  
agaza@ycst.com  
rvrana@ycst.com  
swilson@ycst.com

*Attorneys for Defendant Arm Holdings PLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

QUALCOMM INC., a Delaware corporation,  
QUALCOMM TECHNOLOGIES, INC., a  
Delaware corporation,

Plaintiffs,

v.

ARM HOLDINGS PLC, f/k/a ARM LTD., a  
U.K. corporation,

Defendant.

C.A. No. 24-490-MN

**PUBLIC VERSION  
(Filed August 11, 2025)**

**PROPOSED ORDER GRANTING ARM'S MOTION TO COMPEL**

IT IS HEREBY ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2025, that Arm Holdings P:C's Motion to Compel is GRANTED as follows:

Qualcomm Inc. and Qualcomm Technologies, Inc. (collectively "Qualcomm") shall

- (1) provide a deposition date for Pradeep Kanapathipillai;
- (2) provide 30(b)(6) witnesses for the various topics it has improperly withheld testimony;
- (3) provide discovery on the requests it is improperly claiming lack of relevance;
- (4) provide discovery necessary for Arm to assess Qualcomm's claim that Arm breached its ALA by not providing OOBs and ACK patches;
- (5) regarding its tortious interference claims, provide information (and testimony) on its own communications with the media about its rights under the Qualcomm ALA despite alleging that Arm's statements about the same damaged Qualcomm's customer relationships, and it should unseal the identities of the companies;

(6) explain the theory on which it plans to litigate its UCL claim, including in what market competition was harmed, what competitors were harmed, how so, what products were affected, and what effect that had on consumers in that market and permit additional discovery, as the limited information provided by Qualcomm to date has significantly hampered Arm's ability to defend against Qualcomm's claim; and

(7) comply with this Court's ESI Order (D.I. 85) as it pertains to search terms and custodians.

---

Helena C. Rychlicki  
Special Master